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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IMPLICIT NETWORKS, INC.,

Plaintiff,

V.

JUNIPER NETWORKS, INC.,

Defendant.

Case No. C 10-4234 SI

**STIPULATED MOTION FOR
LEAVE TO SERVE AMENDED
DISCLOSURES UNDER PATENT
LOCAL RULES 3-1 TO 3-4 AND
[PROPOSED] ORDER**

Pursuant to Civil Local Rule 7-12 and Patent Local Rule 3-6, Plaintiff Implicit Networks, Inc. (“Plaintiff”) and Defendant Juniper Networks, Inc. (“Defendant”) hereby stipulate through their respective counsel of record as follows:

STIPULATED MOTION FOR LEAVE TO SERVE
AMENDED DISCLOSURES AND [PROPOSED]
ORDER

1 WHEREAS, on May 23, 2011, Plaintiff served its disclosures under Patent Local
2 Rules 3-1 and 3-2 ("infringement contentions");

3 WHEREAS, on July 22, 2011, Defendant served its disclosures under Patent
4 Local Rules 3-3 and 3-4 ("invalidity contentions");

5 WHEREAS, the parties have recently learned additional information pertinent to
6 these infringement and invalidity contentions based on ongoing discovery and
7 disclosures exchanged in connection with the claim construction proceedings in this
8 case;

9 WHEREAS, Plaintiff seeks also to streamline its contentions in this case by
10 narrowing contentions as to alleged infringement by certain products or services; and

11 WHEREAS, Plaintiff has already, on November 15, 2011, served its amended
12 infringement contentions on Defendant; and

13 WHEREAS, in light of Plaintiff's amended infringement contentions, Defendant
14 seeks to amend its invalidity contentions no later than January 31, 2012.

15 NOW THEREFORE the parties through their undersigned counsel, pursuant to
16 Patent Local Rule 3-6, hereby stipulate and request the Court to grant leave:

17 1. For Plaintiff to provide amended infringement contentions pursuant to Patent
18 Local Rules 3-1 and 3-2, as served on Juniper on November 15, 2011; and

19 2. For Defendant to provide amended invalidity contentions pursuant to Patent
20 Local Rules 3-3 and 3-4, to be served on Plaintiff no later than January 31, 2012.

21 **IT IS SO STIPULATED.**

1 Dated: December 8, 2011

HOSIE RICE LLP

5 Dated: December 8, 2011

IRELL & MANELLA LLP

6 By: /s/ George F. Bishop

George F. Bishop

4 Attorneys for Plaintiff Implicit Networks, Inc.

5 Dated: December 8, 2011

6 By: /s/ Daniel P. Hipskind

7 Daniel P. Hipskind

8 Attorneys for Defendant Juniper Networks, Inc.

10 I hereby attest pursuant to General Order 45.X.B. that concurrence in the
11 electronic filing of this document has been obtained from the other signatories.

12 DATED: December 8, 2011

13 /s/George F. Bishop

14 George F. Bishop

1
ORDER

2 Pursuant to the stipulation of the parties, it is hereby ORDERED that leave is
3 granted (1) for Plaintiff to provide amended infringement contentions pursuant to Patent
4 Local Rules 3-1 and 3-2, as served on Juniper on November 15, 2011; and (2) for
5 Defendant to provide amended invalidity contentions pursuant to Patent Local Rules 3-3
6 and 3-4, to be served on Plaintiff no later than January 31, 2012.

7
PURSUANT TO STIPULATION IT IS SO ORDERED.

8
9 Dated: December 12, 2011

